

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
) No. 08 CR 372
v.)
) Hon. James B. Zagel
EDWARD R. VELAZQUEZ)

Motion to Revoke Release Order

The UNITED STATES OF AMERICA, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, respectfully moves this Court to revoke defendant's release order.

1. On May 8, 2008, defendant was charged in an indictment with mail fraud, wire fraud, and interstate transportation of stolen property relating to an alleged investment fraud scheme.
2. On May 16, 2008, the Court entered an order setting the conditions for defendant's release pending resolution of the criminal case. Defendant was released on an unsecured \$100,000 bond. Among the terms of defendant's bond was that defendant "report to Pretrial Services as directed." Most recently, Pretrial Services directed defendant to report telephonically between the 1st and 5th of every month.
3. On or about November 18, 2009, Pretrial Services issued a Violation Report, noting that defendant failed to report to Pretrial Services by November 5, 2009. On November 23, 2009, Pretrial Services reported to the government that it has still had no contact with defendant. Attempts to reach him by telephone have been unsuccessful as calls to the telephone number previously used by defendant go

unanswered and there is no longer an option to leave a voicemail message.

WHEREFORE, the United States respectfully requests that the Court revoke defendant's release order so that he may be detained pending resolution of this criminal case.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By: /s/ Brian Hayes
BRIAN HAYES
Assistant United States Attorney
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Date: November 23, 2009

CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF), the following document:

MOTION TO REVOKE RELEASE ORDER

was served pursuant to the district court's ECF system as to ECF filers on NOVEMBER 23, 2009.

/s/ Brian Hayes

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